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Declaration of Steven Whitman

I, Steven Whitman, depose and state as follows:

1. I am over 18 years old.
2. I conducted a statistical analysis in *Bond v. Utreras*, related to the issue of reported police misconduct.
3. In conducting the statistical analysis in *Bond*, I obtained information from source materials produced by the Chicago Police Department, but my analysis did not require me to know or learn private personal information.
4. In 2008, I was asked by Plaintiff's counsel in *Ramirez v. City of Chicago* to conduct a new analysis that relied on what I learned in the *Bond* case, and incorporating new data obtained in *Ramirez*.
5. In preparing the analysis in *Ramirez*, I relied on my own knowledge learned in *Bond* and new data provided from the *Ramirez* case. I specifically did not have to review the *Bond* CR files, the Multiple Complaint List, or the Early Intervention Program List from *Bond*.
6. The only new raw data that I used to prepare my report in *Ramirez* was the raw data obtained in *Ramirez*. I did not use any new raw data from *Bond* that was not otherwise included in the November 21, 2006 expert report for *Bond*.
7. I conducted no new analysis from the *Bond* statistical data for use in the *Ramirez* report so that I did not have to review any of the documents produced by the City of Chicago in *Bond*.

I declare under penalty of perjury, under the laws of the United States of America, that the foregoing is true and correct.

Feb 17, 2009
Date

Steven Whitman
Steven Whitman, Ph. D.